

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED
MAY 15 2019
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

SERAPIO FLORES (1)
a.k.a. Seratio, and
THEODORE FLORES (2)
a.k.a. Teo,

Defendants.

THE GRAND JURY CHARGES:

§ SEALED

§

§

§

INDICTMENT

§

§

COUNT 1: 21 U.S.C. §§ 846, 841(a)(1) &
841(b)(1)(A)(viii) – Conspiracy to Possess
with the intent to distribute 500 grams or
more of a mixture or substance containing
methamphetamine

SA 19 CR 0347
4:19mj0904

FB

COUNT ONE

(21 U.S.C. §§ 846, & 841(a)(1) & 841(b)(1)(A)(viii))

United States Courts
Southern District of Texas
FILED

May 17, 2019

David J. Bradley, Clerk of Court

That on or about January of 2019, and continuing through and including February 15, 2019, in the Western District of Texas, and elsewhere, Defendants,

**SERAPIO FLORES a.k.a. Seratio (1) and
THEODORE FLORES a.k.a. Teo (2),**

knowingly, intentionally, and unlawfully conspired, combined, confederated and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved methamphetamine, a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) in the quantities set forth below:

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of methamphetamine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY	STATUTE
SERAPIO FLORES a.k.a. Seratio (1)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine	21 U.S.C. § 841(b)(1)(A)(viii)
THEODORE FLORES a.k.a. Teo (2)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine	21 U.S.C. § 841(b)(1)(A)(viii)

All in violation of Title 21, United States Code, Sections 846.

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: 


DAPHNE D. NEWAZ
Assistant U.S. Attorney

SEALED

UNITED STATES MAGISTRATE COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

MAY 15 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No.

SERAPIO FLORES (1),
a.k.a. Seratio

Defendant.

SA 19 CR 0347 FB

GOVERNMENT'S MOTION TO DETAIN DEFENDANT
AND MOTION FOR CONTINUANCE

TO THE UNITED STATES MAGISTRATE JUDGE:

The United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to Title 18 U.S.C. 3142, files this Motion to Detain Defendant and Motion for Continuance and moves for the detention of the Defendant without bond. No condition or combination of conditions will reasonably assure the Defendant's appearance and/or the safety of others, for the following reasons:

I. SEC. 3142(f); THREE-DAY CONTINUANCE

- ☐ The Defendant is charged with a "crime of violence," as that term is defined in 18 USC 3156(a)(4), a human trafficking offense under 18 USC 1591, or a terrorism offense under 18 USC 2332b(g)(5)(B), for which a maximum term of imprisonment of ten years or more is prescribed;
- ☐ The Defendant is charged with an offense for which the maximum sentence is life imprisonment or death;
- ☒ The Defendant is charged with an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (21 USC 801 et seq.), or the Controlled Substances Import and Export Act (21 USC 951 et. seq.);
- ☐ The Defendant is charged with a felony offense and has been convicted of two or more prior felonies, each of which is a crime of violence, (as defined in 18 USC 3156(a)(4)), a violation of 18 USC 1591, a violation of 18 USC 2332b(g)(5)(B), or a violation of the Controlled Substances Act (21 USC 801 et seq.) or the Controlled Substances Import and Export Act (21 USC 951 et. seq.), or state offenses which had they been charged in federal court would have been offenses falling within these categories, for which the prescribed punishment is ten years or more;
- ☐ The Defendant is charged with an offense that involves a minor victim; or involves the possession or use of a firearm (including by not limited to Felon in Possession), destructive device, or any other dangerous weapon; or involves a failure to register under Title 18, United States Code, Section 2250;

☐ A serious risk exists that the Defendant will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate or attempt to threaten, injure, or intimidate a prospective witness or juror;

☒ A serious risk exists that the accused will flee;

Accordingly, the Government moves for detention without bond and requests a three-day continuance of the hearing on this matter.

II. SEC. 3142(d): TEN-DAY CONTINUANCE

The defendant may flee or poses a danger to the community or to any other person, and:

☐ At the time the offense was committed the Defendant was on release pending trial for a felony offense;

☐ At the time the offense was committed the Defendant was on release pending imposition of sentence, appeal of sentence, or completion of sentence for any offense;

☐ At the time the offense was committed the Defendant was on probation or parole for any offense;

The Government moves for detention and requests a ten-day continuance of the hearing on this matter.

WHEREFORE, PREMISES CONSIDERED, no condition or conditions will reasonably assure the appearance of Defendant as required and the safety of the community, and pursuant to 18 U.S.C. § 3142(f), the Government requests that the Court detain Defendant without bond pending trial, and asks for a hearing on this matter.

Respectfully submitted,


JOHN F. BASH
United States Attorney

/s/

DAPHNE D. NEWAZ
Assistant United States Attorney
STATE BAR NO. 24056036
601 NW Loop 410, Suite 600
San Antonio, Texas 78216-5512
Phone: (210) 384-7100

SEALED

UNITED STATES MAGISTRATE COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED
MAY 15 2019
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WESTERN DISTRICT OF TEXAS
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UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No.

THEODORE FLORES (2)
a.k.a. Teo,

Defendant.

SA 19 CR 0347 FB

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AND MOTION FOR CONTINUANCE

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- ☐ The Defendant is charged with a "crime of violence," as that term is defined in 18 USC 3156(a)(4), a human trafficking offense under 18 USC 1591, or a terrorism offense under 18 USC 2332b(g)(5)(B), for which a maximum term of imprisonment of ten years or more is prescribed;
- ☐ The Defendant is charged with an offense for which the maximum sentence is life imprisonment or death;
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- ☐ The Defendant is charged with an offense that involves a minor victim; or involves the possession or use of a **firearm** (including by not limited to Felon in Possession), destructive device, or any other dangerous weapon; or involves a failure to register under Title 18, United States Code, Section 2250;

☐ A serious risk exists that the Defendant will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate or attempt to threaten, injure, or intimidate a prospective witness or juror;

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The Government moves for detention and requests a ten-day continuance of the hearing on this matter.

WHEREFORE, PREMISES CONSIDERED, no condition or conditions will reasonably assure the appearance of Defendant as required and the safety of the community, and pursuant to 18 U.S.C. § 3142(f), the Government requests that the Court detain Defendant without bond pending trial, and asks for a hearing on this matter.

Respectfully submitted,

JOHN F. BASH
United States Attorney

/s/

DAPHNE D. NEWAZ
Assistant United States Attorney
STATE BAR NO. 24056036
601 NW Loop 410, Suite 600
San Antonio, Texas 78216-5512
Phone: (210) 384-7100

SEALED

UNITED STATES DISTRICT COURT

for the
Western District of Texas

United States of America

v.
Serapio Flores (1)
a/k/a Seratio

Case No. SA-19-CR-347-FB (1)

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

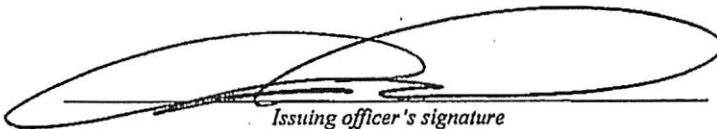
YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Serapio Flores, a/k/a Seratio

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
 ☐ Supervised Release Violation Petition
 ☐ Violation Notice
 ☐ Order of the Court

This offense is briefly described as follows:

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(viii) - Conspiracy to possess with the intent to distribute 500 grams or more of a mixture or substance containing methamphetamine.

Date: 05/15/2019

 Issuing officer's signature
City and state: San Antonio, Texas
Wayne Garcia U.S. Deputy Clerk
 Printed name and title
Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

 Arresting officer's signature

 Printed name and title

SEALED

UNITED STATES DISTRICT COURT

for the
Western District of TexasUnited States of America
v.
Theodore Flores

Case No. SA-19-CR-347-FB (2)

Defendant

ARREST WARRANT

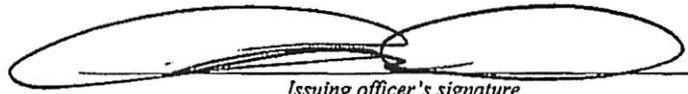
To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Theodore Flores a/k/a "TEO"
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(viii) - Conspiracy to possess with the intent to distribute 500 grams or more of a mixture or substance containing methamphetamine.

Date: 05/15/2019

Issuing officer's signature

City and state: San Antonio, TexasWayne Garcia U.S. Deputy Clerk

Printed name and title

ReturnThis warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title